

1 MELANIE D. MORGAN, ESQ.
 2 Nevada Bar No. 8215
 3 SCOTT R. LACHMAN, ESQ.
 4 Nevada Bar No. 12016
 5 AKERMAN LLP
 6 1635 Village Center Circle, Suite 200
 7 Las Vegas, NV 89134
 Telephone: (702) 634-5000
 Facsimile: (702) 380-8572
 Email: melanie.morgan@akerman.com
 Email: scott.lachman@akerman.com

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 9 *Attorneys for Bank of America, N.A.*

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 11 **UNITED STATES DISTRICT COURT**
 12 **DISTRICT OF NEVADA**

13 SFR INVESTMENTS POOL 1, LLC,
 14 Plaintiff
 vs.
 15 BANK OF AMERICA, N.A.; DOES 1-10; and
 ROE BUSINESS ENTITIES 1-10, inclusive,
 Defendants

16 Case No. 2:22-cv-00630-CDS-EJY

17
 18 **STIPULATION AND ORDER TO**
EXTEND DISPOSITIVE
MOTION DEADLINE
(SECOND REQUEST)

19 SFR Investments Pool 1, LLC and Bank of America, N.A. stipulate to extend the dispositive
 motion deadline to thirty (30) days following the court's ruling on Bank of America's motion to
 dismiss. ECF No. 34. The current deadline is February 6, 2023. ECF No. 37. The parties are
 requesting additional time in light of the pending motion as well as ongoing settlement discussions.
 The parties wish to save client expenses on summary judgment briefs while the motion to dismiss is
 pending. The parties understand that a ruling is unlikely to be made by February 6, 2023.

20 The parties believe it is a better use of client expenses to focus their efforts on settlement. If
 21 the parties have to draft summary judgment briefs, it could impact the amount each side has to settle
 22 the matter. SFR provided a good-faith settlement offer to Bank of America, and the Bank anticipates
 23 responding to the offer in the next two weeks. Bank of America's counsel is actively obtaining
 24 settlement authority from both Bank of America and the Federal National Mortgage Association.

1 The parties have a *long history* of reaching settlements in quiet title litigation and truly
 2 believe this is a matter where resolution is very likely. For example, SFR made a substantially
 3 similar offer to another loan servicer that Bank of America's counsel represents with respect to a half
 4 dozen properties. SFR and that servicer ultimately reached a global settlement, saving the parties
 5 and judiciary substantial time and expenses. The parties aim to reach a settlement here and are not
 6 too far apart from doing so. Their settlement discussions—both in written form and orally—have
 7 been productive, and they will continue these frank discussions once Bank of America's counsel
 8 obtains authority. A settlement will avoid the need for summary judgment briefing, and the court
 9 from having to rule on a motion to dismiss and two summary judgment motions.

10 This is the parties' second request for an extension of this deadline, and is not intended to
 11 cause any delay or prejudice to any party. To the extent the court denies this motion, then the parties
 12 request a status hearing prior to February 6, 2023.

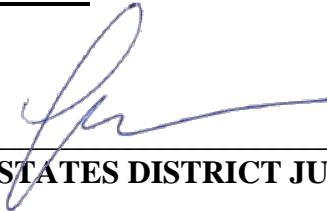
13 DATED this 13th day of January, 2023.

14	AKERMAN LLP	HANKS LAW GROUP
15	<u>/s/ Scott R. Lachman</u>	<u>/s/ Chantel M. Schimming</u>
16	MELANIE D. MORGAN, ESQ.	KAREN L. HANKS, ESQ.
17	Nevada Bar No. 8215	Nevada Bar No. 9578
18	SCOTT R. LACHMAN, ESQ.	CHANTEL M. SCHIMMING, ESQ.
19	Nevada Bar No. 12016	Nevada Bar No. 8886
20	1635 Village Center Circle, Suite 200	7625 Dean Martin Drive, Suite 110
	Las Vegas, NV 89134	Las Vegas, NV 89139
	<i>Attorneys for Bank of America, N.A.</i>	<i>Attorneys for SFR Investments Pool 1, LLC</i>

21

22 **ORDER**

23 **IT IS SO ORDERED.**

24 
 25 **UNITED STATES DISTRICT JUDGE**

26 DATED: January 13, 2023